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21 CHASOM BROWN, WILLIAM BYATT,
22 JEREMY DAVIS, CHRISTOPHER
22 CASTILLO, and MONIQUE TRUJILLO
23 individually and on behalf of all similarly
23 situated,

24 Plaintiffs,

25 vs.

26 GOOGLE LLC,

28 Defendant.

Case No.: 4:20-cv-03664-YGR-SVK

**PLAINTIFFS' UPDATE TO
ADMINISTRATIVE MOTION
REGARDING THEIR RENEWED
REQUEST TO DEPOSE GOOGLE CEO
SUNDAR PICHAI**

The Honorable Susan van Keulen

Pursuant to the Court's Order (Dkt. 596), Plaintiffs respectfully submit this update:

Borsay Deposition: On June 3, 2022, after the Court issued its order, Google agreed to produce Ms. Borsay for a video-recorded deposition on June 29 and 30, 2022, with time evenly split between the *Brown* and *Calhoun* Plaintiffs.

The parties are currently finalizing the Hague applications for Ms. Borsay's deposition and intend to file those papers today. Plaintiffs hope the deposition will be completed by June 30, 2022. Plaintiffs will update the Court to confirm that the deposition proceeded as anticipated.

Proposed Order: Plaintiffs have no changes to their proposed order (Dkt. 565-3). If Plaintiffs are able to complete Ms. Borsay's deposition by June 30, 2022, then Plaintiffs respectfully request leave to submit a brief of no more than five pages (with a supporting declaration and exhibits) within 21 days (by July 21, 2022).

Dated: June 6, 2022

Respectfully submitted,

By: /s/Mark C. Mao

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